

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

CHARLES JOHNSON, )  
Plaintiff, )  
v. ) Case No. 4:20-cv-00179  
VERIZON CMP HOLDINGS, LLC, )  
HUFFPOST.COM, INC., and ANDY )  
CAMPBELL, )  
Defendants. )

**STIPULATION DISMISING VERIZON CMP HOLDINGS, LLC WITHOUT PREJUDICE**

This Stipulation is between plaintiff Charles Johnson (“Johnson”) and defendant Verizon CMP Holdings, LLC (“Verizon CMP”) (collectively as the “Parties”). On or about January 16, 2020, Johnson filed a complaint entitled, Johnson v. Verizon CMP Holdings, LLC, et. al., Case No. 4:20-cv-00179 (“Johnson Lawsuit”), alleging a cause of action for libel involving an article written by defendant Andy Campbell and posted on the website of defendant TheHuffingtonPost.com, Inc. The Johnson Lawsuit also named Verizon CMP as a defendant. Counsel for Verizon CMP has advised counsel for Johnson that Verizon CMP is not a proper party to the Johnson Lawsuit as Verizon CMP has no ties to the other defendants to the action regarding the article at issue in the Johnson Lawsuit.

Further, counsel for Verizon CMP has advised counsel for Johnson that they intend to file a motion to dismiss on behalf of Verizon CMP that it is not a proper party to the Johnson Lawsuit. In order to avoid the expense and time for Verizon CMP to file such a motion, the Parties have agreed

to enter into this Stipulation whereby Johnson as agreed to dismiss Verizon CMP from the Johnson Lawsuit without prejudice.

IT IS HEREBY STIPULATED AND AGREED that by no later than March 10, 2020, Johnson will file a dismissal without prejudice, effectively dismissing Verizon CMP from the Johnson Lawsuit, and thereby removing the necessity for Verizon CMP to file a motion to dismiss.

AGREED TO BY:

CAMARA & SIBLEY LLP

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been filed on this 5<sup>th</sup> day of March, 2020, pursuant to the electronic filing requirements of the United States District Court for the Southern District of Texas, which provide for service on counsel of record in accordance with the electronic filing protocols in place.

*/s/ Joseph D. Sibley*  
Joseph D. Sibley